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**From:** Albright, David [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=8C24CAABEA47449C95C94ACB6AC1C49E-DALBRIGH]  
**Sent:** 1/31/2020 4:05:50 PM  
**To:** McEvoy, Molly [mcevoy.molly@epa.gov]  
**CC:** Kobelski, Bruce [Kobelski.Bruce@epa.gov]; Bates, William [bates.william@epa.gov]; Ho, Yenhung [Ho.Yenhung@epa.gov]  
**Subject:** RE: Class VI Upload Data Confidentiality Question

Okay, thanks for the prompt reply Molly. We'll talk to Wayne to get a better handle on how much information/data they have that they would claim as confidential. Thanks, David

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**From:** McEvoy, Molly <mcevoy.molly@epa.gov>  
**Sent:** Friday, January 31, 2020 7:32 AM  
**To:** Albright, David <Albright.David@epa.gov>  
**Cc:** Kobelski, Bruce <Kobelski.Bruce@epa.gov>; Bates, William <bates.william@epa.gov>  
**Subject:** RE: Class VI Upload Data Confidentiality Question

Hi David,

The GSDT is not designed to receive CBI, but there are alternative ways EPA can receive the data. The UIC Class VI Well Recordkeeping, Reporting, and Data Management Guidance says the following:

*In light of the nearly universal use of computerized systems (particularly for wells as technically complex as Class VI wells), the EPA anticipates that most owners or operators will be able to submit data electronically using the GSDT. However, the EPA recognizes that there may be some circumstances where it will be necessary to submit data non-electronically or via an alternative electronic method. For example, the GSDT is not designed to receive confidential business information (CBI). Owners or operators who would like to claim information as CBI or otherwise discuss the possibility of submitting data outside of the GSDT should contact their permitting authority for further information and instructions. If any owners or operators cannot submit the required data using the GSDT, they should work with their UIC Program Director to identify an appropriate alternate reporting format or procedure to ensure regulatory compliance.*

I hope this helps. Let me know if you need anything else.

Thanks,  
Molly

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Molly McEvoy  
Office of Ground Water & Drinking Water  
U.S. Environmental Protection Agency  
Washington, D.C.  
Phone: 202-564-4765

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**From:** Albright, David <Albright.David@epa.gov>  
**Sent:** Friday, January 31, 2020 9:55 AM  
**To:** McEvoy, Molly <mcevoy.molly@epa.gov>  
**Cc:** Kobelski, Bruce <Kobelski.Bruce@epa.gov>  
**Subject:** Fwd: Class VI Upload Data Confidentiality Question

Hi Molly, Wayne Rowe has reached out to me on behalf of the CES project with a question/concern about CBI protection. See his note below. I told him I would look into this matter and get back to him. Could you clarify this for me? Thanks, David

Sent from my iPhone

Begin forwarded message:

**From:** Wayne Rowe <[rowe5@slb.com](mailto:rowe5@slb.com)>  
**Date:** January 30, 2020 at 4:22:33 PM PST  
**To:** "Albright, David" <[Albright.David@epa.gov](mailto:Albright.David@epa.gov)>  
**Cc:** Rebecca Hollis <[RHollis@CleanEnergySystems.com](mailto:RHollis@CleanEnergySystems.com)>  
**Subject:** Class VI Upload Data Confidentiality Question

David,

In assisting Clean Energy Systems prepare the Pre-construction Class VI application we are using some well log data and seismic data under license from data brokers, such as IHS. The license agreements specify that we are not allowed to show data or derivatives to third parties via Internet. We are explaining the application process to the data brokers and I think it would be helpful for us to be able to convey if the images, tables and figures that are included in the narrative and various attachments are public documents, if they can be kept confidential and what needs to be done to be in compliance with the license terms. Would it be possible to have a call with you or someone on your team to provide some clarity on this question?

Regards,  
Wayne

Wayne Rowe  
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